



A-99-03
IV-6-01
HUMISEAL DIVISION
CHASE CORPORATION
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Date: July 23, 1999
Our File: CT-31 EPA

The Docket Clerk
Air and Radiation Docket and
Information Office
401 M Street S.W., Room M-1500
Mail Code: 6102
Waterside Mall, Washington DC 20460

**SUBJECT: Petition to Remove MEK from the Clean Air HAPs List;
EPA Docket No.: A-99-03; FRL-6364-8**

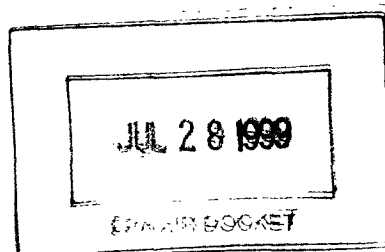
Dear Sir or Madam:

I urge you to expeditiously grant the delisting of Methyl Ethyl Ketone (MEK) from the hazardous air pollutants list of the Clean Air Act.

HumiSeal would like to use limited amounts of MEK in solvent borne coatings in conjunction with environmentally friendly solvents like Oxsol 100 and Tert Butyl Acetate and personnel friendly solvents like PM Acetate. The small amount of MEK (about 15% by weight) makes these coatings easier to use and facilitates a better quality coating job than could otherwise be obtained. The resultant VOC of these coatings will be less than 250 grams per liter.

The improper listing of MEK as a HAPs makes some of our customers uncomfortable with regard to both employee safety and regulatory compliance.

HumiSeal manufactures and supplies conformal coatings which are used to protect printed circuit boards from failure caused by corrosion (moisture). Our coatings are used for many different military and commercial applications including avionics and the automotive industry. (We are including a partial list of products which use HumiSeal). Many of our coatings are MIL-SPEC and/or Underwriters Laboratories qualified.



(Continued)

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HumiSeal also offers a number of 100% solids (i.e. solvent-free) high tech coatings. Sometimes traditional solvent borne coatings provide a better coating job than these new, "sophisticated" coatings.

Sincerely,

A handwritten signature in dark ink, appearing to read "Edward B. Mines". The signature is fluid and cursive, with the first name "Edward" being more prominent.

Edward B. Mines
Senior Chemist - HumiSeal Division

cc: Art Wesp, Shell Chemical Co., PO Box 4320, Houston, TX. 77251
Andrew Jacques, Chemical Manufacturer Association, 1300 Wilson Blvd.,
Arlington, VA. 22209

Enclosure
EBM:ke



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P.C. Assemblies Coated with HumiSeal:

1. Autos (all auto electronics)
2. Burglar alarms (home, auto)
3. Aircraft communications
4. Computers (Notebook)
5. Postage meters
6. Digital watches
7. Vending machines
8. Toll collecting machines
9. Change makers
10. Elevator controls
11. Electronic instruments
12. Wireless communications
13. Telephone equipment
14. Machine controls
15. Smoke detectors
16. Fire detectors
17. Naval navigation equipment
18. Missile controls
19. Medical instrumentation
20. Hearing aids
21. Air-conditioning controls
22. Washing machines
23. Guidance controls
24. Outdoor signs
25. Buoys
26. Pay telephones
27. Electronic parking meters
28. Refrigerators
29. Fire alarm pull boxes
30. Chemical process controllers
31. Aircraft navigation equipment
32. Fluorescent lighting ballasts
33. Data processing equipment
34. Controllers used in paper mills
35. Auto cruise control
36. Microwave ovens
37. Wireless transmitters for animals
38. Transformers
39. Wireless communication networks
40. Outdoor lighting
41. Copy machines
42. Climate control equipment
43. Auto washing equipment
44. Railway locomotives
45. Railroad signaling equipment
46. Windmill mechanisms
47. Oil refinery electronics
48. Radar
49. Thermostats
50. Emergency power generators
51. EMI/RFI filters
52. Environmental monitoring equipment
53. Cash machines
54. Communications satellites
55. Thermocouple meters
56. Electronic scoreboards
57. Emergency lighting
58. Military electronics
59. Electric tool controls

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